

TAB 11

Edward O'Brien

06/16/2005

1

Volume: I

Pages: 1-105

Exhibits: None

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 04-10131 RBC

----- X
HEATHER KIERNAN,

Plaintiff

vs.

ARMORED MOTOR SERVICE OF AMERICA, INC.

and FRANCESCO CIAMBRIELLO,

Defendants
----- X

DEPOSITION OF EDWARD O'BRIEN

Thursday, June 16, 2005 - 9:59 a.m.

McLeod Law Offices

77 Franklin Street

Boston, Massachusetts

Reporter: Maureen J. Manzi, CSR

1 systems involved.

2 Q. And the two systems being?

3 A. The money room system --

4 Q. The money room system and another system?

5 A. And then another black and white system.

6 Q. And the black and white system would have
7 the same time imprinted on it?

8 A. On all the cameras.

9 Q. On all the cameras. In terms of security at
10 that Attleboro facility, were there holdup buttons
11 located within the facility that an AMSA employee
12 could press to alert a facility, people outside AMSA
13 that there was some type of emergency in the
14 facility?

15 MR. MCLEOD: Objection.

16 A. Yes.

17 Q. Do you recall how many of those buttons were
18 located in the Attleboro facility?

19 A. I'm trying to remember specifically. There
20 would be one in dispatch. There would be one in the
21 money room. Probably both money rooms.

22 Q. Were there two money rooms in Attleboro?

23 A. They walked through one directly and then
24 they walked down the hallway next to the other one.

1 There was one -- should have been one in the
2 manager's office, and then should have been one in
3 the vault. That's our standard.

4 Q. And can you describe for me what that button
5 looks like within the facility?

6 A. Well, at the time there would have been
7 buttons on the wall. They would have been white.
8 They should have been marked HOLDUP BUTTONS with
9 some type of paper above them where you put your
10 finger and pull it down.

11 Q. And if somebody within the facility pushes
12 that button, what happens?

13 A. It activates an alarm to one of our security
14 companies who calls the police. There's no alarm in
15 the building. It's a silent alarm. And then the
16 police come down and surround the building.

17 Q. And so each of the buttons within the
18 facility is marked in some way to alert people as to
19 exactly what it is?

20 MR. MCLEOD: Objection.

21 A. It should be because it's not a public
22 facility. We want our employees to know if there is
23 a problem.

24 Q. And the language that you believe is on the

1 sign said HOLDUP BUTTON?

2 MR. MCLEOD: Objection.

3 A. Would be HOLDUP BUTTON.

4 MS. ROMANTZ: I don't have any
5 questions.

6 MR. MCLEOD: I have a couple.

7 REDIRECT EXAMINATION

8 BY MR. MCLEOD:

9 Q. Was there ever a diagram of the interior of
10 the Attleboro facility that showed where cameras
11 were located and what they would have viewed, like
12 what the viewing area of those cameras would have
13 been such as something that would have shown zones
14 or anything along those lines?

15 A. Was there one at one point?

16 Q. Yes.

17 A. Yeah.

18 Q. Was there one that existed at one point that
19 would have shown which cameras were attached to
20 which system in May of 2001?

21 A. Yeah, there was. I'm sure there was on the
22 initial when we went in to renovate it and built the
23 facility, put the systems in. We had to go to the
24 contractors and show them where we wanted certain